

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TIFFANY ROBINSON,)	
)	
Plaintiff,)	
)	No. 08 C 185
vs.)	
)	Judge Ronald A. Guzman
H&R BLOCK, INC. & HSBC BANK)	
USA, N.A. et al.,)	
)	
Defendants.)	
)	

**AGREED MOTION FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE PLEAD**

Defendant HSBC Bank USA, N.A. (“HSBC”), by its attorneys, hereby moves this Court for a fourteen-day extension of time to answer or otherwise plead in response to the complaint filed by plaintiff Tiffany Robinson (“Plaintiff”). In support of its motion, HSBC states as follows:

1. Plaintiff filed her complaint on January 9, 2008. A copy of the complaint was served on HSBC on January 14, 2008, making its answer or other responsive pleading due on February 4, 2008.
2. Defendant HSBC seeks a fourteen-day extension of its deadline to answer or otherwise plead, to February 18, 2008.
3. On February 4, 2008, counsel for HSBC contacted counsel for Plaintiff to request an agreed 14-day extension of time for HSBC to answer or otherwise plead in response to the Complaint. Plaintiff’s counsel had no objection to the extension.

4. The short extension requested by this motion will allow HSBC to consider the allegations of the complaint and formulate its response thereto, including due consideration of a settlement of the above-captioned action, which may obviate the need for any further action before the Court.

5. This is HSBC's first motion for extension. This motion is made in good faith and not for purposes of unnecessary delay.

WHEREFORE: Defendant HSBC respectfully requests that this Court grant it a fourteen day extension of time to answer or otherwise plead, to February 18, 2008.

Respectfully submitted,

HSBC Bank USA, N.A.

BY: /s/ Kevin M. Fee, Jr.
One of their Attorneys

February 4, 2008

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CERTIFICATE OF SERVICE

I, Kevin M. Fee, Jr., an attorney, hereby state I caused a copy of the attached Defendant's Motion for Extension of Time to Answer or Otherwise Plead to be served via the Court's electronic filing system, upon:

Keith J. Keogh
Law Offices of Keith J. Keogh, Ltd.
227 West Monroe Street
Suite 2000
Chicago, Illinois 60606

On this 4th day of February, 2008.

/s/ Kevin M. Fee, Jr.

Kevin M. Fee, Jr.